

POLICY - PROTECTION OF PERSONAL INFORMATION

Executive Summary:

- Appropriate personal information is required to participate in any church-based activity, pastoral care, or financial support.
 - This includes any information necessary to partake in the activity and support the 2-way communication necessary for that activity.
- Supplying this information at the time of enrollment denotes permission to use the information with respect to that activity.
- The data collected will be handled according to the following Detailed Policy.

Detailed Policy

Christ First is committed to the protection of personal information that is collected, used, disclosed or retained in the course of its activities. In doing so it will be guided by the ten **Fair Information Principles** which form the ground rules for such protection under the federal legislation, Personal Information Protection and Electronic Documents Act (PIPEDA), and recommended by the United Church of Canada (UCC).

PERSONAL INFORMATION is a broad category, including any factual or subjective information which can be linked to an identifiable individual and which exists in any form (e.g., printed, electronic, oral).

1. **ACCOUNTABILITY:** The Church Council is accountable for compliance with these principles. The responsibility for compliance is shared by all Committees and other bodies, staff and volunteers.
2. **IDENTIFYING PURPOSES:** The purposes for which the information is being collected must be identified before it is collected.
3. **CONSENT:** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate. Consent must be meaningful but its nature can vary. In some instances, implied/inferred consent may be adequate; for example, if an individual supplies contact information to register for an activity, it can reasonably be inferred that consent is given to being contacted about that activity. In other instances, consent must be express, particularly if the information is sensitive or if the collection, use or disclosure is outside the reasonable expectations of the individual or could result in significant harm.
4. **LIMITING COLLECTION:** Only information needed for the identified purposes must be collected, and it must be collected by fair and lawful means.
5. **LIMITING USE, DISCLOSURE AND RETENTION:** Unless the individual consents otherwise or there is a legal requirement, personal information can only be used or disclosed for the identified purposes for which it was collected, and must only be kept as long as required to serve those purposes.
6. **ACCURACY:** Personal information must be as accurate, complete and up-to-date as possible to serve the identified purposes.

7. **SAFEGUARDS:** Personal information must be protected by security measures appropriate to its sensitivity (e.g., locked or password protected files, access limited to specific individuals, and secure deletion or shredding upon disposal). If the information must be shared with another organization or individual to serve the identified purposes there must be agreement by the other party to comply with these principles.
8. **OPENNESS:** Christ First will make information about its policies and practices relating to personal information publicly and readily available.
9. **INDIVIDUAL ACCESS:** Upon request, an individual must be given access to information on the existence, nature, use and disclosure of their personal information, allowed to challenge its accuracy and completeness, and have it amended as appropriate.
10. **CHALLENGING COMPLIANCE:** An individual can challenge Christ First's compliance with these principles by contacting the Chair of Council.

References

1. [United Church of Canada \(UCC\) Privacy Policy \(Approved February 2020\)](#)
2. [Federal Personal Information Protection and Electronic Documents Act \(PIPEDA, Revised May, 2019\).](#)

Responsibility

Christ First Council